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CASE NO: A-22-849675-C  
Department 27

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

LAJOY WATSON, an individual,  
Plaintiff,

Case No.  
Dept. No.

v.

**COMPLAINT**

DOLGEN MIDWEST, LLC, dba DOLLAR  
GENERAL CORPORATION, a domestic  
limited-liability company; DOE  
INDIVIDUALS I-X, inclusive; and ROE  
CORPORATIONS I-X, inclusive,  
Defendants.

**DEMAND FOR JURY TRIAL**

Plaintiff LaJoy Watson, by and through her counsel of record, The Powell Law Firm, complains against Defendant Dolgen Midwest, LLC, dba Dollar General Corporation ("Dollar General") as follows:

**THE PARTIES**

1. Plaintiff LaJoy Watson is and was a resident of Clark County, Nevada for all times relevant herein.

2. Defendant Dollar General is and was a limited liability company authorized to do business in the State of Nevada for all times relevant herein.

3. The true names and capacities of the defendants designated as Doe or Roe Corporations are unknown to Plaintiff LaJoy Watson, who therefore sues those defendants by fictitious names. When the true names and capacities of these defendants are ascertained, Plaintiff will seasonably amend this Complaint.



1                   12. Defendant Dollar General failed to caution or warn Plaintiff LaJoy Watson or  
2 otherwise make safe the dangerous condition.

2 || otherwise make safe the dangerous condition.

13. Defendant Dollar General should have warned Plaintiff LaJoy Watson or otherwise made safe the dangerous condition because that condition was non-obvious to Plaintiff.

4 | otherwise made safe the dangerous condition because that condition was non-obvious to Plaintiff.

14. Defendant Dollar General negligently, carelessly, and recklessly caused, maintained, and/or allowed the dangerous condition to exist.

6 || maintained, and/or allowed the dangerous condition to exist.

7           15. Defendant Dollar General's negligence has caused Plaintiff LaJoy Watson to  
8 sustain physical and emotional injuries, all or some of which conditions may be permanent and  
9 disabling, and all to Plaintiff's damages in a sum in excess of \$15,000.00.

8 || sustain physical and emotional injuries, all or some of which conditions may be permanent and

9 | disabling, and all to Plaintiff's damages in a sum in excess of \$15,000.00.

10           16. Defendant Dollar General's negligence has required Plaintiff LaJoy Watson to  
11 receive ongoing medical care and other treatment for the aforementioned injuries.

11 receive ongoing medical care and other treatment for the aforementioned injuries.

12 17. Plaintiff LaJoy Watson's injuries have limited her occupational and recreational  
13 activities, which have caused Plaintiff LaJoy Watson a loss of earning capacity, lost wages,  
14 physical impairment, mental anguish, and loss of enjoyment of life. These damages are ongoing.

13 || activities, which have caused Plaintiff LaJoy Watson a loss of earning capacity, lost wages,

14 physical impairment, mental anguish, and loss of enjoyment of life. These damages are ongoing.

15           18. As a direct and proximate result of the aforementioned negligence of all  
16 Defendants, Plaintiff LaJoy Watson has been required to engage the services of an attorney,  
17 incurring attorney's fees and costs to bring this action.

16 Defendants, Plaintiff LaJoy Watson has been required to engage the services of an attorney,

17 | incurring attorney's fees and costs to bring this action.

18 FIRST CAUSE OF ACTION

19                    19.      Plaintiff LaJoy Watson incorporates all prior paragraphs as though fully set forth  
20      here.

20 | here.

21           20. Defendant Dollar General owed Plaintiff LaJoy Watson a duty of care to maintain  
22 the premises free of dangerous conditions.

22 | the premises free of dangerous conditions.

23           21. Defendant Dollar General owed Plaintiff LaJoy Watson a duty of care to avoid  
24 creating a dangerous condition on their property.

24 | creating a dangerous condition on their property.

25           22. Defendant Dollar General owed Plaintiff LaJoy Watson a duty of care to remedy  
26 any dangerous condition on their property irrespective of the source of the dangerous condition.

26 any dangerous condition on their property irrespective of the source of the dangerous condition.

27

1           23. Defendant Dollar General owed Plaintiff LaJoy Watson a duty of care to warn her  
2 of the non-obvious and dangerous condition.

3           24. Defendant Dollar General breached its duty of care by maintaining a dangerous  
4 condition, creating a dangerous condition, failing to remedy the dangerous condition, and/or  
5 failing to place caution signs, or otherwise failing to warn Plaintiff LaJoy Watson of the dangerous,  
6 non-obvious condition.

7           25. Defendant Dollar General failed to take adequate steps to either remedy the  
8 dangerous condition, or through its own negligence, caused the dangerous condition to be present,  
9 thus causing damage and injury to Plaintiff LaJoy Watson.

10          26. As a direct and proximate result of the negligence of Defendant Dollar General,  
11 Plaintiff LaJoy Watson has been damaged in an amount in excess of \$15,000.

12                                   **DEMAND FOR JURY TRIAL**

13          27. Pursuant to NRCP 38, Plaintiff LaJoy Watson demands a jury trial on the issues  
14 and claims in this complaint.

15          ...

16          ...

17          ...

**PRAYER FOR RELIEF**

Plaintiff LaJoy Watson prays for judgment against Defendant Dollar General as follows:

1. General damages sustained by Plaintiff in an amount exceeding \$15,000;
2. Special damages sustained by Plaintiff in an amount exceeding \$15,000;
3. Reasonable attorney's fees and costs;
4. Interest at the statutory rate; and
5. Any other relief the Court deems just and proper.

Dated March 14, 2022.

**THE POWELL LAW FIRM**

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